

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

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In re:

Supor Properties Enterprises LLC, *et al.*,<sup>1</sup>  
  
Debtors.

Case No. 24-13427 (SLM)  
Judge: Stacey L. Meisel  
Chapter 11

(Jointly Administered)

Hearing Date: October 1, 2024

Hearing Time: 11:00 a.m.

**STIPULATION BETWEEN DEBTORS AND HARRISON REDEVELOPMENT  
AUTHORITY REGARDING WITNESSES AND EXHIBITS LIST REGARDING THE  
DEBTORS' MOTION TO AUTHORIZE AND APPROVE (I) SALE OF REAL  
PROPERTY; (II) ASSUMPTION AND ASSIGNMENT OF EXECUTORY CONTRACTS  
AND UNEXPIRED LEASES; (III) REJECTION OF UNEXPIRED LEASES AND (IV)  
GRANTING RELATED RELIEF [DOCKET NO. 195]**

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number are: Supor Properties Enterprises LLC (5580); J Supor 136-1 Realty LLC (3205); Supor-172 Realty LLC (5662); Supor Properties Breiderhoft LLC (7258); Supor Properties Devon LLC (6357); Shore Properties Associates North LLC (6707); Supor Properties 600 Urban Renewal, LLC (8604); JS Realty Properties, LLC (2497); and Supor Properties Harrison Avenue, LLC (1728).

WHEREAS Debtors and Harrison Redevelopment Authority (“HRA” and, together with Debtors, the “Parties”) acting through undersigned counsel hereby stipulate and agree as follows:

1. The Parties hereby stipulate and agree that the below listed witnesses may be called to testify at the hearing on *Debtors’ Motion to Authorize and Approve (I) Sale of Real Property; (II) Assumption and Assignment of Executory Contracts and Unexpired Leases; (III) Rejection of Unexpired Leases and (IV) Granting Related Relief* [Docket No. 195] currently scheduled for October 1, 2024, at 11:00 a.m. (the “Hearing”).

**WITNESSES**

- a. Joseph Supor, III
- b. Antong He
- c. Paul Zarbetski
- d. Rebuttal and impeachment witnesses, subject to the right of the opposing Party to object on any grounds.

2. The Parties hereby stipulate and agree that the Declarations of Joseph Supor, III listed as Exhibits 1 and 16 below shall be admitted into evidence as the direct testimony of Joseph Supor III in lieu of live testimony and without cross examination.

3. The Parties stipulate and agree to the admission into evidence of each of the Exhibits set forth below.

**EXHIBITS**

<b>Exhibit</b>	<b>Description of Exhibit</b>	<b>Offered</b>	<b>Admitted</b>	<b>Disposition</b>
1	Declaration of Joseph Supor, III in Support of Debtors Motion to Authorize and Approve (I) Sale of Real Property; (II) Assumption and Assignment of Executory Contracts and Unexpired Leases; (III) Rejection of Unexpired Leases and (IV) Granting Related Relief [Docket No. 195-1]  <i>Hearing Binder – Tab 2</i>			Admitted on consent as direct testimony in support of Motion
2	Ex. A to Supor Declaration [Docket No. 195-2]  <i>Hearing Binder – Tab 3</i>			Admission by Stipulation
3	Certification Of Paul J. Zarbetski in Support of Town of Harrison and Harrison Redevelopment Agency’s Limited Objection to Debtors’ Motion to Authorize and Approve (I) Sale of Real Property; (II) Assumption and Assignment of Executory Contracts and Unexpired Leases; (III) Rejection of Unexpired Leases and (IV) Granting Related Relief [Docket No. 242]  <i>Hearing Binder – Tab 7</i>			
4	“Requirements for FA Assignment 7-22-24” and related emails dated July 24, 2024, attached as Exhibit A to Certification of Paul Zarbetski [Docket No. 242]  <i>Hearing Binder – Tab 7</i>			Admission by Stipulation

5	<p>“H Capital letter to HRA requesting assignment of the Harrison/Supor RDA dated August 29, 2024” attached as Exhibit B to Certification of Paul Zarbetski [Docket No. 242]</p> <p><b><i>Hearing Binder – Tab 7</i></b></p>			Admission by Stipulation
6	<p>“Banker Group LLC, letter dated September 10, 2024” attached as Exhibit C to Certification of Paul Zarbetski [Docket No. 242]</p> <p><b><i>Hearing Binder – Tab 7</i></b></p>			Admission by Stipulation
7	<p>“HRA letter dated September 11, 2024, providing copy of Banker Group letter of September 10, 2024 and advising of special meeting for Monday, September 16, 2024 at 1:00 PM” attached as Exhibit C to Certification of Paul Zarbetski [Docket No. 242]</p> <p><b><i>Hearing Binder – Tab 7</i></b></p>			Admission by Stipulation
8	<p>“H Capital letter dated September 13, 2024 providing supplemental responses to HRA” attached as Exhibit E to Certification of Paul Zarbetski [Docket No. 242]</p> <p><b><i>Hearing Binder – Tab 7</i></b></p>			Admission by Stipulation
9	<p>“Banker Group LLC, letter to HRA dated September 16, 2024” attached as Exhibit F to Certification of Paul Zarbetski [Docket No. 242]</p> <p><b><i>Hearing Binder – Tab 7</i></b></p>			Admission by Stipulation

10	<p>“HRA Resolution dated September 16, 2024” attached as Exhibit F to Certification of Paul Zarbetski [Docket No. 242]</p> <p><b><i>Hearing Binder – Tab 7</i></b></p>			Admission by Stipulation
11	<p>“September 18, 2024, email from James Bruno to counsel for H Capital and others regarding additional information needed” attached as Exhibit G to Certification of Paul Zarbetski [Docket No. 242]</p> <p><b><i>Hearing Binder – Tab 7</i></b></p>			Admission by Stipulation
12	<p>“September 20, 2024, correspondence from James Bruno to counsel for H Capital and others regarding RDA parking requirements” attached as Exhibit H to Certification of Paul Zarbetski [Docket No. 242]</p> <p><b><i>Hearing Binder – Tab 7</i></b></p>			Admission by Stipulation
13	<p>“H Capital letter dated September 20, 2024 providing supplemental responses to HRA” attached as Exhibit I to Certification of Paul Zarbetski [Docket No. 242]</p> <p><b><i>Hearing Binder – Tab 7</i></b></p>			Admission by Stipulation
14	<p>“Banker Group LLC, letter to HRA dated September 23, 2024” attached as Exhibit J to Certification of Paul Zarbetski [Docket No. 242]</p> <p><b><i>Hearing Binder – Tab 7</i></b></p>			Admission by Stipulation

15	<p>“HRA Resolution dated September 23, 2024” attached as Exhibit J to Certification of Paul Zarbetski [Docket No. 242]</p> <p><b><i>Hearing Binder – Tab 7</i></b></p>			Admission by Stipulation
16	<p>Declaration of Joseph Supor, III in Support of Assumption and Assignment of Redevelopment Agreement to H Capital Partners LLC [Docket No. 250-1]</p> <p><b><i>Hearing Binder – Tab 9</i></b></p>			Admitted on consent as direct testimony in support of Motion
17	<p>Amended and Restated Redevelopment Agreement dated 2/24/2021 attached as Exhibit A to Declaration of Joseph Supor III [Docket No. 250-2 and 250-3]</p> <p><b><i>Hearing Binder – Tab 9</i></b></p>			Admission by Stipulation
18	<p>Stadium Parking Agreement dated 5/16/2006 attached as Exhibit A to Declaration of Joseph Supor III [Docket No. 250-4]</p> <p><b><i>Hearing Binder – Tab 9</i></b></p>			Admission by Stipulation
19	<p>Certification of Antong He in Support of the Debtors’ Motion to Authorize and Approve (I) Sale of Real Property; (II) Assumption and Assignment of Executory Contracts and Unexpired Leases; (III) Rejection of Unexpired Leases and (IV) Granting Related Relief. Including all Exhibits thereto [Docket No. 250-5]</p> <p><b><i>Hearing Binder – Tab 10</i></b></p>			

20	<p>“H Capital Application to the HRA on August 29, 2024” attached as Exhibit A to Certification of Antong He [Docket No. 250-6]</p> <p><b><i>Hearing Binder – Tab 10</i></b></p>			Admission by Stipulation
21	<p>“First supplemental response to the HRA dated September 14, 2024” attached as Exhibit B to Certification of Antong He [Docket No. 250-6]</p> <p><b><i>Hearing Binder – Tab 10</i></b></p>			Admission by Stipulation
22	<p>“Second supplemental response of H Capital to the HRA on September 20, 2024” attached as Exhibit C to Certification of Antong He [Docket No. 250-6]</p> <p><b><i>Hearing Binder – Tab 10</i></b></p>			Admission by Stipulation
23	<p>“HSBC Account Statement for He Family Trust” attached as Exhibit D to Certification of Antong He [Docket No. 250-6]</p> <p><b><i>Hearing Binder – Tab 10</i></b></p>			Admission by Stipulation
24	<p>“Unaudited financial statements of H Capital Group, LLC” attached as Exhibit E to Certification of Antong He [Docket No. 250-6]</p> <p><b><i>Hearing Binder – Tab 10</i></b></p>			Admission by Stipulation

25	<p>“Personal financial statement of Tong He” attached as Exhibit F to Certification of Antong He [Docket No. 250-6]</p> <p><b><i>Hearing Binder – Tab 10</i></b></p>			Admission by Stipulation
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**SO STIPULATED**

McManimon, Scotland & Baumann, LLC  
*Attorneys for Harrison Redevelopment Authority*

K&L Gates LLP  
*Special Counsel for the Debtors*

By: /s/ Sari B. Placona  
Sari B. Placona

By: /s/ David S. Catuogno  
David S. Catuogno